



FEB 01 2017

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY DEPUTY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LHF PRODUCTIONS, INC  
**Plaintiff,**

vs.

ROBERT BENNET, WOODROW ROSS,  
LEONARD W. HARRISON III, DANIEL  
ARIAS, SIMON DEMAR, LUCAS RASKY,  
CHRISTOPHER COMPSON, NADEZH  
MIKITYUK, TAYLOR BOLTON, JUSTIN  
BARTLEY, NICOLLEEN BHAGATRAM,  
JONATHON BAUGHER,  
**Defendants,**

Civil Action No: 16-cv-1354RSM

ANSWER AND AFFIRMATIVE  
DEFENSES WITH COUNTERCLAIM

COMES NOW Defendant NADEZHDA MIKITYUK ("Defendant"), and hereby admits, denies, and alleges as follows:

1.

Defendant is without knowledge of the facts alleged in Plaintiff's Complaint, and therefore denies the same. Defendant has not been involved in copying and distributing to maintain for-profit exploitation of any motion pictures, including "London is fallen", mentioned in Plaintiff's complaint of any other works of LHF PRODUCTIONS, INC.

Defendant doesn't possess any copies of motion picture "London is fallen".

Defendant and her family members don't have needed skills and abilities to download protected files from BigTorrent.

2.

Defendant denies each and every other material allegation of Plaintiff's Complaint.

1  
2 FIRST AFFIRMATIVE DEFENSE

3 Failure to State a Claim for Relief

4 3.

5 Plaintiff has failed to state a claim upon which relief could be granted. Defendant has never  
6 been involved in copying, sharing or distributing of any motion pictures, nor in any for-profit  
7 exploitation of picture.

8 SECOND AFFIRMATIVE DEFENSE

9 Lack of Standing

10 4.

11 Plaintiff, as the defendant is informed and believes, lacks the legal standing to bring and  
12 maintain this action. Plaintiff's complaint operate by no commonly used technical terminology  
13 and information, which should be presented by Court trusted specialists in form of professional  
14 expertise.  
15

16 THIRD AFFIRMATIVE DEFENSE

17 Statute of Frauds

18 5.

19 Plaintiff is barred by the Statute of Frauds.

20 THIRD AFFIRMATIVE DEFENSE

21 Failure to Validate the Action

22 6.

23 Plaintiff has not proven the fact of action against them had place and any damage is valid and  
24 accurate. The Plaintiff has not proved that the Defendant had any personal relationship to  
25

1 unlawful observe the Plaintiff's picture, nor sharing or distributions. Plaintiff no any reason to  
2 believe in Defendant's for-profit exploitation of LHF PRODUCTIONS, INC's works.  
3 Defendant is not liable for non-authorize use of IP address, which is protected by Comcast  
4 system.

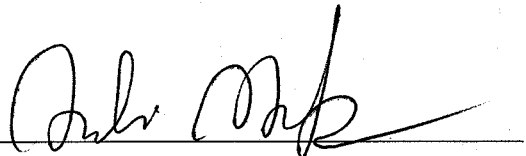
7 PRAYER

8 WHEREFORE, having fully answered plaintiff's Complaint, defendant prays:

- 9 1. - for a judgment dismissing Plaintiff's complaint with prejudice;  
10 2. - for Defendant's reasonable consulting fees, traveling and other expenses, caused by  
11 Plaintiff's complaint.

12 Dated this 28 day of January, 2017.

14 By



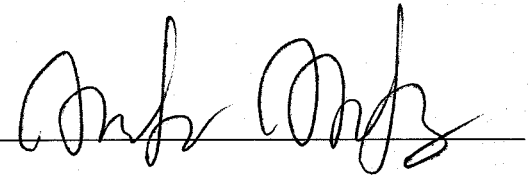
15 Nadezhda Mikityuk  
16 13009 NE 55th St,  
17 Vancouver, WA, 98662

CERTIFICATE OF SERVICE

I, hereby certify that on the 28st day of January, 2017, I deposited true copy of the  
ANSWER AND AFFIRMATIVE DEFENSES in first class mail to the following:

**David A. Lowe**  
**Lowe Graham Jones**  
**701 Fifth Avenue, Suite 4800**  
**Seattle, WA 98104**

By



Nadezhda Mikityuk  
13009 NE 55th St ,  
Vancouver, WA, 98662